

Attorney for Plaintiff:  
**THE RANDO LAW FIRM P.C.**  
6800 Jericho Turnpike  
Syosset, NY 11791  
(516) 799-9800

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
ELIZABETH BOEY CHAU, M.D.,	:
	:
Plaintiff,	:
	:
-against-	:
	: <b>Civ. Act. No.: 14-CV-8484 (GHW)</b>
HARTFORD LIFE INSURANCE COMPANY,	:
HOWARD FUTERMAN, M.D.,	:
EVELYN K. BALOGUN, M.D.,	:
DAVID HOENIG, M.D.,	: <b>ORAL ARGUMENT REQUESTED</b>
DAYTON DENNIS PAYNE, M.D.,	:
RELIABLE REVIEW SERVICES, INC.,	:
EXAMWORKS GROUP, INC.,	:
JANE DOE,	:
	:
Defendants.	:
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**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and Declaration of Robert J. Rando, Esq. with attached EXHIBITS, Plaintiff, Elizabeth Boey Chau (“Chau”) by her attorney, The Rando Law Firm P.C., will move this Court at a time and date designated by the Court, before the Hon. Gregory H. Woods, U.S.D.J., at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, Courtroom 9A, New York, NY 10007, for an Order granting Plaintiff’s Motion To Request Extra Record Discovery, to conduct extra record discovery in the above-captioned case and for such other relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that Chau requests that Judge Woods hear oral argument on Plaintiff's Motion To Request Extra Record Discovery on a date and time to be designated by the Court.

Dated: Syosset, New York  
May 16, 2016

Respectfully submitted,

THE RANDO LAW FIRM P.C.

By: s/  
Robert J. Rando, Esq. (RR-5765)  
6800 Jericho Turnpike – Suite 120W  
Syosset, New York 11791  
(516) 799-9800 (o) • (516) 799-9820 (f)  
Attorney for Plaintiff,  
Elizabeth Boey Chau, M.D.

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he caused a true and accurate copy of the annexed, **NOTICE OF MOTION**, to be served by United States Priority Mail and Electronic ECF Filing on the following counsel for Defendant:

Michael H. Bernstein, Esq.  
Matthew P. Mazzola, Esq.  
SEDGWICK LLP  
225 Liberty Street, 28th Floor  
New York, NY 10281-1008;

this 16<sup>th</sup> day of May, 2016.

s/\_\_\_\_\_  
Robert J. Rando, Esq.